IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA Alexandria Division

ZOROASTRIAN CENTER AND DARB-E-MEHR OF METROPOLITAN WASHINGTON, D.C.,

Plaintiff,

Civil Action No. 1:13-cv-980-LO/TRJ

v.

RUSTAM GUIV FOUNDATION, et al.,

Defendants.

MOTION FOR ATTORNEY'S FEES AND COSTS

Defendants Rustam Guiv Foundation, Daryoush Jahanian, as Trustee, Mehraban Sharvini, as Trustee, Soroosh Sorooshian, as Trustee, Bruce (Borzoo) Nadjmi, as Trustee and Khosro Mehrfar, as Trustee, (collectively, the "Defendants"), by counsel and pursuant to the Order of May 12, 2014, hereby move for attorney's fees and costs from the Plaintiff, Zoroastrian Center and Darb-E-Mehr of Metropolitan Washington, D.C. ("ZCDMW"). For the reason set forth in the accompanying memorandum of law, Defendants Motion for Attorney's Fees should be granted.

WHEREFORE, Defendants Rustam Guiv Foundation, Daryoush Jahanian, as Trustee, Mehraban Sharvini, as Trustee, Soroosh Sorooshian, as Trustee, Bruce (Borzoo) Nadjmi, as Trustee and Khosro Mehrfar, as Trustee respectfully request entry of an Order granting this Motion; ordering payment of attorney's fees; and, for such other and further relief as this Court deems just and proper.

Respectfully submitted this 9th day of June, 2014.

RUSTAM GUIV FOUNDATION OF NEW YORK

/s/ Massie Payne Cooper

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Counsel for Defendants/Counterclaim Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on the 9th day of June, 2014, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System, which will then send a notification of such filing (NEF) to the following:

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